

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK**

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9384-2557 Québec Inc., a Canadian corporation; MINEDMAP, INC., a Nevada corporation; and SERENITY ALPHA, LLC, a Nevada limited liability, and other similarly situated individuals	:	1:19-CV-00501-TJM-CFH
Plaintiff,	:	SUPPLEMENT TO PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT
against	:	(ECF Case)
NORTHWAY MINING, LLC, a New York limited liability company; MICHAEL MARANDA, an individual; MICHAEL CARTER, an individual; CSX4236 MOTORCYCLE SALVAGE, LLC, a New York limited liability company; DROR SVORAI, an individual; MINING POWER GROUP, INC., a Florida corporation; HUDSON DATA CENTER, INC, a New York Corporation, MICHAEL MARANDA, LLC, a New York Limited liability company; PORTER KING HILL CONTRACTING, LLC, a New York limited liability company; COINMINT, LLC, a Delaware limited liability company; OSWEGO DATA LLC, a New York Limited Liability Company; LORI S. THOMPSON, LCSW, PLLC, a professional limited liability corporation; LORI S. THOMPSON, an individual, ANTHONY PORTER, an individual; and DONALD D'AVANZO, an individual	:	
Defendants.	:	
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Plaintiffs, through counsel, T. Edward Williams, Esq., submits this supplement in support of their Motion for Leave to Amend because, on May 6, 2020, Plaintiffs obtained information

that putative Defendant, Angelo Pope, defrauded Plaintiffs acting in concert with the other named and putative Defendants. On the same basis, Plaintiffs seek to add M&T Bank and Teachers Federal Credit Union.

On May 1, 2020, Plaintiffs moved for leave to amend their Complaint to add additional defendants and additional claims. See ECF Nos. 50 and 51. For the reasons stated in Plaintiffs' Motion for Leave to Amend and the Declaration attached to it, Plaintiffs seek to add putative Defendant, Angelo Pope. Plaintiffs also seek to add Teachers Federal Credit Union and M&T Bank as Defendants.

Further, this matter may involve significant third-party practice. Defendant, Michael Maranda, is a convicted felon and he was jailed in federal prison as Inmate No. 71609-053. From 2017 through 2018, when he defrauded Plaintiffs, Michael Maranda was out of prison on parole. Michael Maranda's Parole Officer may now seek to participate in this proceeding to determine whether Michael Maranda violated the terms of his parole and bring the appropriate proceeding against Michael Maranda.

Dated as of May 7, 2020.
New York, New York

RESPECTFULLY SUBMITTED,

/s/ T. Edward Williams, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May 2020, this **SUPPLEMENT TO PLAINTIFFS MOTION FOR LEAVE TO AMEND COMPLAINT** was served on the following individuals:

John Harwick, Esq. *via ECF*
Counsel for Maranda Defendants